

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

<p>ACQIS LLC, v. SONY INTERACTIVE ENTERTAINMENT INC., SONY INTERACTIVE ENTERTAINMENT LLC, Defendants.</p>	<p>Plaintiff, Civil Action No. 6:22-cv-386-ADA JURY TRIAL DEMANDED [REDACTED]</p>
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**DECLARATION OF LOGAN J. DREW IN OPPOSITION TO
SONY'S MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF
CALIFORNIA, OR IN THE ALTERNATIVE, TO THE AUSTIN DIVISION OF THE
WESTERN DISTRICT OF TEXAS**

I, Logan J. Drew, hereby declare as follows:

1. I am an attorney with the law firm of Robins Kaplan LLP, counsel of record for Plaintiff ACQIS LLC in the above-captioned matter. I submit this declaration based on personal knowledge following a reasonable investigation. If called upon as a witness, I could and would competently testify to the truth of each statement herein.

2. Attached as **Exhibit 1 [PUBLIC]** is a true and correct copy of an excerpt from Exhibit A to Plaintiff ACQIS LLC's Preliminary Infringement Contentions from this matter, served on the Sony Defendants on February 3, 2023.

3. Attached as **Exhibit 2 [PUBLIC]** is a true and correct copy of an excerpt from Exhibit B-1 to Plaintiff ACQIS LLC's Preliminary Infringement Contentions from *ACQIS LLC*

v. Microsoft Corp., No. 6:22-cv-00385-ADA, relating to the Microsoft Xbox One, served on Microsoft on February 3, 2023.

4. Attached as **Exhibit 3 [FILED UNDER SEAL]** is a true and correct copy of

[REDACTED]

5. Attached as **Exhibit 4 [FILED UNDER SEAL]** is a true and correct copy of

[REDACTED]

[REDACTED]

6. Attached as **Exhibit 5 [FILED UNDER SEAL]** is a true and correct copy of

[REDACTED]

[REDACTED]

7. Attached as **Exhibit 6 [FILED UNDER SEAL]** is a true and correct copy of

[REDACTED]

[REDACTED]

8. Attached as **Exhibit 7 [FILED UNDER SEAL]** is a true and correct copy of

[REDACTED]

[REDACTED]

9. Attached as **Exhibit 8 [PUBLIC]** is a true and correct copy of an article from the *Austin American-Statesman* entitled “Plugged In: AMD gets crucial chip design wins on game consoles,” dated Aug. 10, 2013 (updated Sept. 25, 2018).

10. Attached as **Exhibit 9 [PUBLIC]** is a true and correct copy of an article from the *Austin American-Statesman* entitled “As AMD reaches ‘inflection point,’ is it narrowing gap with rival Intel?,” dated May 5, 2022 (**with yellow highlighting added**).

11. Attached as **Exhibit 10 [FILED UNDER SEAL]** is a true and correct copy of Sony Interactive Entertainment Inc. and Sony Interactive Entertainment LLC’s First Supplemental Objections and Responses to ACQIS LLC’s Interrogatories Regarding Venue (Nos. 1-5), dated Feb. 23, 2023 (**with yellow highlighting added**).

12. Attached as **Exhibit 11 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Tom McKeone, former employee of Advanced Micro Devices, Inc. (**with yellow highlighting added**). Mr. McKeone’s profile indicates that Austin, Texas is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

13. Attached as **Exhibit 12 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Masooma Bhaiwala, former employee of Advanced Micro Devices, Inc. Ms. Bhaiwala’s profile indicates that Andover, Massachusetts is her present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

14. Attached as **Exhibit 13 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Bob Feldstein, former employee of Advanced Micro Devices, Inc. Mr. Feldstein’s

profile indicates that Marlborough, Massachusetts is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

15. Attached as **Exhibit 14 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Rick Fuller, employee of Advanced Micro Devices, Inc. Mr. Fuller's profile indicates that Boston, Massachusetts is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

16. Attached as **Exhibit 15 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Rick Hagen, former employee of Advanced Micro Devices, Inc. Mr. Hagen's profile indicates that Marlborough, Massachusetts is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

17. Attached as **Exhibit 16 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Andi Skende, former employee of Advanced Micro Devices, Inc. Mr. Skende's profile indicates that Westford, Massachusetts is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

18. Attached as **Exhibit 17 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Peter Pellerite, former employee of Advanced Micro Devices, Inc. Mr. Pellerite's profile indicates that Leominster, Massachusetts is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

19. Attached as **Exhibit 18 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Chris Kilburn, employee of Advanced Micro Devices, Inc. Mr. Kilburn's profile indicates that Cedar Park, Texas, in the Western District of Texas, is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

20. Attached as **Exhibit 19 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Mignonne Gros, former employee of Advanced Micro Devices, Inc. Mr. Gros's profile indicates that Austin, Texas is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

21. Attached as **Exhibit 20 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Brian Hunter, former employee of Advanced Micro Devices, Inc. Mr. Hunter's profile indicates that the San Francisco Bay Area is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

22. Attached as **Exhibit 21 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Amy Lau, employee of Advanced Micro Devices, Inc. Ms. Lau's profile indicates that Richmond Hill, Ontario, Canada is her present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

23. Attached as **Exhibit 22 [PUBLIC]** is a true and correct copy of the LinkedIn profile of Jeff Connell, employee of Advanced Micro Devices, Inc. (**with yellow highlighting added**). Mr. Connell's profile indicates that Austin, Texas, in the Western District of Texas, is his present location. The LinkedIn profile was downloaded and printed on March 22, 2023.

24. **Exhibits 23 through 34 [ALL PUBLIC]** are true and correct copies of LinkedIn profiles for 12 current or former employees of Advanced Micro Devices, Inc. (**with yellow highlighting added to identify relevant roles/knowledge**). Their respective locations, all of which are in the Western District of Texas, are set forth in the table below. All LinkedIn profiles were downloaded and printed on March 22, 2023.

AMD Custodian/ Witness	Ex.	Location	Role/Knowledge
Kursad Albayraktaroglu (former)	23	Austin, Texas	Worked on design verification of APU for Sony PS4 (Ex. 23 at 2-3)

Victor Andrade (former)	24	Austin, Texas	Worked with team responsible for design of custom circuits used at chip-level of AMD's 28nm APU devices (Ex. 24 at 2)
Renato Fragale (current)	25	Round Rock, Texas	Managed 15-person product development team for Sony PS4 (Ex. 25 at 2)
Robert George (current)	26	Austin, Texas	Chief architect and technical lead for AMD for PS4 and PS4 Pro APU; worked closely with Sony to define, architect, and champion a series of next-generation APUs (Ex. 26 at 3)
Frank Helms (current)	27	Austin, Texas	System architect for AMD's "Fusion" CPU/GPU integration products; technical representative to AMD customer Sony (Ex. 27 at 2)
Jack Huynh (current)	28	Austin, Texas	Sr. Vice President & General Manager, Semi-Custom Group; runs semi-custom business across strategy, product development and architecture, silicon SoC design and platform engineering (Ex. 28 at 2)
Nick Jones (former)	29	Austin, Texas	Led planning and execution of validation for the PS4 APU, working directly with Sony (Ex. 29 at 2-3)
George Mantaring (former)	30	Austin, Texas	Was responsible for SoC verification for x86 processor designs, including the PS4 APU; debugged configuration, modeling, and RTL issues (Ex. 30 at 2)
Scott Matlock (former)	31	Austin, Texas	Served as technical lead to validate and enable APU products in Ultra Low Power (ULP) segment (Ex. 31 at 3)
Saeid Moshkelani (current)	32	Austin, Texas and/or Los Gatos, CA	Led AMD's semi-custom business unit from infancy (Ex. 32 at 2)
Vassil Papageorgiou (current)	33	Austin, Texas	Defines and executes product liability qualification for APU and game console products (Ex. 33 at 1)
Jason "JT" Scott (current)	34	Austin, Texas	Electrical fault isolation product manager and product owner of game console products, including PlayStation products (Ex. 34 at 2)

25. Attached as **Exhibit 35 [FILED UNDER SEAL]** is a true and correct copy of Sony Interactive Entertainment Inc. and Sony Interactive Entertainment LLC's Second

Supplemental Objections and Responses to ACQIS LLC's Interrogatories Regarding Venue
(Nos. 1-5), dated Mar. 8, 2023 (**with yellow highlighting added**).

26. Attached as **Exhibit 36 [PUBLIC]** is a true and correct copy of excerpts from U.S. District Courts – Combined Civil and Criminal Federal Court Management Statistics (dated Sept. 30, 2022) (available at https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile0930.2022.pdf).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of March, 2023, in Minneapolis, Minnesota.

Respectfully submitted,

/s/ Logan J. Drew
Logan J. Drew